

EXHIBIT 4

8/27/2024

VirtaMove Corp. v. Amazon.com, Inc., et al Susan Cameron 30(b)(6)

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS MIDLAND/ODESSA DIVISION</p> <p>_____ VIRTAMOVE, CORP.,) Plaintiff,)) Case Number: V.) 7:24-CV-00030) AMAZON.COM, INC.; AMAZON.COM) SERVICES LLC; and AMAZON WEB) SERVICES, INC.,) Defendants.) _____)</p> <p style="text-align: center;">30(b)(6) DEPOSITION OF SUSAN CAMERON ON BEHALF OF VIRTAMOVE, CORP. August 27, 2024 11:02 a.m. Eastern Daylight Time</p> <p>Reported by: Lori J. Goodin, RPR, CRR, RSA, California CSR #13959</p> <p style="text-align: center;">_____ DIGITAL EVIDENCE GROUP 1730 M Street, NW, Suite 812 Washington, D.C. 20036 (202) 232-0646</p>	<p style="text-align: right;">Page 3</p> <p>1 INDEX TO EXAMINATION 2 3 WITNESS: SUSAN CAMERON 4 EXAMINATION BY PAGE 5 MR. ANAPOL 6 6 MR. TONG 215 7 MR. ANAPOL 218 8 9 INDEX TO EXHIBITS 10 SUSAN CAMERON 11 VirtaMove, Corp. V. Amazon.com, Inc., et al 12 Tuesday, August 27, 2024 13 Lori J. Goodin, RPR, CRR, RSA, 14 California CSR #13959 15 EXHIBIT DESCRIPTION PAGE 16 Exhibit 1001 VM_AMAZON_0001097, Travel 17 Itinerary for Mr. Topitsch 18 to Texas, 1/28/16 33 19 Exhibit 1002 VM_AMAZON_0001123, 20 Registration for Greg O'Connor 21 to attend AWS re:Invent, 22 8/17/15 57</p>
<p style="text-align: right;">Page 2</p> <p>1 REMOTE APPEARANCES: 2 3 FOR PLAINTIFF: 4 RUSS AUGUST & KABAT 5 BY: PETER TONG, ESQUIRE 6 4925 Greenville Avenue, Suite 200 7 Dallas, Texas 75206 8 310-826-7474 9 ptong@raklaw.com 10 11 12 FOR DEFENDANTS: 13 KNOBBE MARTENS OLSON & BEAR LLP 14 BY: JEREMY ANAPOL, ESQUIRE 15 2040 Main Street, 14th Floor 16 Irvine, California 92614 17 949-760-0404 18 jeremy.anapol@knobbe.com 19 20 21 Also Present: 22 Billy Fahnert, Videographer/Document Tech</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX TO EXHIBITS, CON'T 2 EXHIBIT DESCRIPTION PAGE 3 Exhibit 1003 VM_AMAZON_0001195, 4 Registration for Greg O'Connor 5 to attend AWS re:Invent, 6 10/30/13 61 7 Exhibit 1004 Press Release from 8 VirtaMove's website, 4/28/21 121 9 Exhibit 1005 VM_AMAZON_0001089, 10 payoff letter, 7/25/18 172 11 Exhibit 1006 VM_AMAZON_0001309, photo 12 of patent and trademark docs 176 13 Exhibit 1007 VM_AMAZON_0000865, Trigence 14 Corp. Technical Submission, 15 FY 2004 183 16 Exhibit 1008 Plaintiff's First Supplemental 17 Objections and Responses to 18 Defendants' First Set of Venue 19 Requests for Interrogatories 203 20 21 22 (Newly marked exhibits retained by reporter.)</p>

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<p style="text-align: right;">Page 117</p> <p>1 A. Yes.</p> <p>2 Q. Did you do any broader searches in</p> <p>3 Greg O'Connor's Google Vault e-mails for AWS?</p> <p>4 A. I could have put just AWS</p> <p>5 agreements. But, outside of that, I don't think</p> <p>6 so.</p> <p>7 Q. Okay. Do you know somebody named</p> <p>8 Mark Woodward?</p> <p>9 A. Yes.</p> <p>10 Q. And he was the Vice President of</p> <p>11 Engineering at VirtaMove; is that correct?</p> <p>12 A. Yes.</p> <p>13 Q. During what time?</p> <p>14 A. Mark was with the company from 2006</p> <p>15 until 2021. He had various titles over the</p> <p>16 years.</p> <p>17 Q. Aside from Vice President of</p> <p>18 Engineering, what titles did he have?</p> <p>19 A. Software Developer, Director of</p> <p>20 Engineering or something similar. And then VP of</p> <p>21 Engineering.</p> <p>22 Q. Do you know if Mark Woodward ever</p>	<p style="text-align: right;">Page 119</p> <p>1 A. Yes.</p> <p>2 Q. What services?</p> <p>3 A. We used Amazon cloud services. And</p> <p>4 I accessed those cloud services for billings to</p> <p>5 pay the invoices. I believe a virtual machine</p> <p>6 that I use on a regular basis is hosted by AWS.</p> <p>7 Other than that, I'm not really</p> <p>8 sure. That is kind of an IT thing.</p> <p>9 Q. Okay. And how much are those</p> <p>10 invoices that you pay? Like just a ballpark</p> <p>11 amount.</p> <p>12 A. Roughly, somewhere around, I will</p> <p>13 say 8,500 Canadian per month.</p> <p>14 Q. Okay. And do you know what</p> <p>15 VirtaMove is using those Amazon cloud services to</p> <p>16 do?</p> <p>17 A. A little bit. So, I know there is</p> <p>18 some storage that we use the services for,</p> <p>19 virtual machines.</p> <p>20 That is the best I can do.</p> <p>21 Q. And you personally use one of those</p> <p>22 virtual machines?</p>
<p style="text-align: right;">Page 118</p> <p>1 signed contracts on behalf of VirtaMove?</p> <p>2 A. He did from time to time.</p> <p>3 Q. And he was authorized to do that by</p> <p>4 VirtaMove?</p> <p>5 A. Excuse me, he was authorized by</p> <p>6 whom?</p> <p>7 Q. By VirtaMove?</p> <p>8 MR. TONG: Objection, vague.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. ANAPOL:</p> <p>11 Q. And, do you have any reason -- so,</p> <p>12 strike that.</p> <p>13 As part of your preparation to</p> <p>14 testify today on behalf of VirtaMove, did you</p> <p>15 investigate VirtaMove's agreements with Amazon?</p> <p>16 A. I did.</p> <p>17 Q. And do you have any reason to doubt</p> <p>18 that Mark Woodward accepted the AWS Partner</p> <p>19 Network terms on October 20, 2017?</p> <p>20 A. I have no reason to doubt that, no.</p> <p>21 Q. Have you personally accessed any AWS</p> <p>22 services during your time at VirtaMove?</p>	<p style="text-align: right;">Page 120</p> <p>1 A. Yep.</p> <p>2 Q. And, have you heard of the AWS</p> <p>3 Partner Network?</p> <p>4 A. Yes.</p> <p>5 Q. What do you know about the AWS</p> <p>6 Partner Network?</p> <p>7 A. The name.</p> <p>8 Q. Did you sign up for an AWS Partner</p> <p>9 Network account on behalf of VirtaMove in 2021?</p> <p>10 A. Yes.</p> <p>11 Q. Who told you to do that?</p> <p>12 A. So, I have to backtrack.</p> <p>13 When you asked about communications</p> <p>14 with AWS.</p> <p>15 So, I had forgotten that there were</p> <p>16 two employees at VirtaMove that did work on</p> <p>17 Marketplace activities, again, in 2021.</p> <p>18 And I was asked by, it may have been</p> <p>19 Mark, to create the account.</p> <p>20 Q. And if it wasn't Mark Woodward, who</p> <p>21 would it have been?</p> <p>22 A. It would have been Candace Holland.</p>

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<p style="text-align: right;">Page 121</p> <p>1 Q. And what was Candace Holland's role 2 at VirtaMove? 3 A. Marketing specialist. 4 Q. And, do you know whose idea it was 5 at VirtaMove to create the AWS account in 2021? 6 MR. TONG: Objection, foundation. 7 THE WITNESS: No. I don't know. 8 MR. ANAPOL: Billy, can you put up 9 Document G. And I think we are on 10 Exhibit 1004. Let's mark that. 11 (Exhibit 1004 marked for 12 identification.) 13 THE VIDEOGRAPHER: Okay. It is in 14 the folder. 15 BY MR. ANAPOL: 16 Q. Do you see Exhibit 1004 in front of 17 you, Ms. Cameron? 18 A. One second. It is hung up on the 19 details item again. How do I get out of it? 20 Okay. Yes, I see the document. 21 Q. Okay. And, Exhibit 1004 is a press 22 release from VirtaMove's website, correct?</p>	<p style="text-align: right;">Page 123</p> <p>1 Q. Okay. So, is it your understanding 2 that VirtaMove by 2021 was offering its 3 Application Migration and Modernization solution 4 through AWS Marketplace? 5 A. That is what it says on the press 6 release. 7 Q. And is that something that customers 8 would pay VirtaMove for? 9 A. Suppose so. 10 Q. And do you know if VirtaMove makes 11 any money from offering its Application Migration 12 and Modernization solution in AWS Marketplace? 13 A. Yes, I would know. 14 Q. And does VirtaMove make money from 15 that? 16 A. No. 17 Q. So, has anybody ever purchased 18 access to VirtaMove's Application Migration and 19 Modernization solution through the AWS 20 Marketplace? 21 A. Not to my knowledge. 22 Q. Okay.</p>
<p style="text-align: right;">Page 122</p> <p>1 A. That is what it looks like. Yes. 2 Q. And the first sentence says, 3 "VirtaMove is pleased to announce that its 4 Application Migration and Modernization solution 5 is now available as a SaaS product in AWS 6 Marketplace." 7 Do you see that sentence? 8 A. Yes. 9 Q. And this document, Exhibit 1004, is 10 dated April 28, 2021. Do you see that? 11 A. Yes. 12 Q. And, so, is your AWS registration in 13 March of 2021 related to the announcement here 14 from April 2021? 15 A. I don't know. It could be. 16 Q. Okay. And do you see at the bottom 17 of Page 1 of Exhibit 1004, there is a quote from 18 Josh Pearson? 19 A. Yes. 20 Q. Did you ever talk to Josh Pearson 21 about AWS? 22 A. Not specifically.</p>	<p style="text-align: right;">Page 124</p> <p>1 A. Not that I can remember. 2 Q. So, why did VirtaMove decide to make 3 its Application Migration and Modernization 4 solution available in the AWS Marketplace? 5 A. I don't think I am the right person 6 to answer that question. 7 Q. You don't know the answer? 8 A. I don't know. 9 Q. So, do you remember what prompted 10 you to register an AWS account for VirtaMove in 11 2021? 12 A. I don't remember but I would have 13 been asked by one of my colleagues to create that 14 account. 15 Q. And do you remember registering for 16 the AWS account in 2021? 17 A. Vaguely. I register for lots of 18 accounts. 19 Q. And do you remember agreeing to the 20 AWS Customer Agreement in March of 2021? 21 A. I don't remember that, no. 22 Q. Do you doubt that you agreed to the</p>

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<p style="text-align: right;">Page 125</p> <p>1 AWS Customer Agreement in March of 2021?</p> <p>2 A. If it is a click through, where you</p> <p>3 have to say I agree; is that what you are</p> <p>4 referring to?</p> <p>5 Q. It would be something shown on the</p> <p>6 website when you register.</p> <p>7 A. Right.</p> <p>8 MR. TONG: Objection, foundation.</p> <p>9 There is not a pending question.</p> <p>10 Could you ask a question?</p> <p>11 BY MR. ANAPOL:</p> <p>12 Q. Do you doubt that you agreed to the</p> <p>13 AWS customer agreement in March of 2021?</p> <p>14 A. I have no reason to doubt it.</p> <p>15 Q. Do you have e-mails from 2021</p> <p>16 relating to your registration of VirtaMove's AWS</p> <p>17 account?</p> <p>18 A. I imagine I received some</p> <p>19 confirmations.</p> <p>20 Q. And is that an e-mail that you would</p> <p>21 have kept?</p> <p>22 A. Probably.</p>	<p style="text-align: right;">Page 127</p> <p>1 Q. And is there anybody else at</p> <p>2 VirtaMove who knows about the account that you</p> <p>3 registered on VirtaMove's behalf?</p> <p>4 A. Possibly Cedric Burgins.</p> <p>5 Q. Who is that?</p> <p>6 A. He is our Director of Technology.</p> <p>7 Q. Anybody else?</p> <p>8 A. I don't think so.</p> <p>9 Q. Does Nigel Stokes know that</p> <p>10 VirtaMove has an AWS account?</p> <p>11 A. Probably.</p> <p>12 Q. Has Nigel Stokes ever asked you to</p> <p>13 cancel the AWS account?</p> <p>14 A. No, I don't think so.</p> <p>15 Q. Has anybody else at VirtaMove asked</p> <p>16 you to cancel the AWS account?</p> <p>17 A. No, I don't think so.</p> <p>18 Q. Do you know who created VirtaMove's</p> <p>19 listing for V-Maestro on the AWS Marketplace?</p> <p>20 A. No.</p> <p>21 Q. You mentioned earlier a</p> <p>22 nondisclosure agreement with AWS. Do you</p>
<p style="text-align: right;">Page 126</p> <p>1 Q. Did you search your e-mails for</p> <p>2 e-mails from AWS relating to the creation of</p> <p>3 VirtaMove's AWS account in 2021?</p> <p>4 A. No, I get a lot of e-mail from AWS.</p> <p>5 Q. Does anybody at VirtaMove, other</p> <p>6 than you, know that VirtaMove has an AWS account?</p> <p>7 A. Has an AWS account?</p> <p>8 Q. Yes.</p> <p>9 A. What account do you mean?</p> <p>10 Q. Well, let's start with the account</p> <p>11 that you registered.</p> <p>12 Does anybody other than you, who</p> <p>13 works at VirtaMove, know about the account you</p> <p>14 registered on VirtaMove's behalf?</p> <p>15 A. Yes, I think so.</p> <p>16 Q. Who else?</p> <p>17 A. So, our IT manager would be aware of</p> <p>18 that.</p> <p>19 Q. Who is that?</p> <p>20 A. Steven Antonie.</p> <p>21 Q. And where is Mr. Antonie located?</p> <p>22 A. He is located in Ottawa, Ontario.</p>	<p style="text-align: right;">Page 128</p> <p>1 remember that?</p> <p>2 A. Yes.</p> <p>3 Q. Who executed that nondisclosure</p> <p>4 agreement on VirtaMove's behalf?</p> <p>5 A. I don't have a copy of the, any</p> <p>6 executed nondisclosure agreements from AWS.</p> <p>7 Q. In the e-mails that you saw about</p> <p>8 the nondisclosure agreement, do you know who from</p> <p>9 VirtaMove was involved?</p> <p>10 A. Yes.</p> <p>11 Q. Who was it?</p> <p>12 A. Giovanni Boschi.</p> <p>13 Q. And, what was Mr. Boschi's role at</p> <p>14 VirtaMove?</p> <p>15 A. Chief Technical Officer.</p> <p>16 Q. And do you know what he was</p> <p>17 discussing with AWS in connection with the NDA?</p> <p>18 A. No idea.</p> <p>19 Q. And what was the date of that NDA?</p> <p>20 A. Again, I don't have the NDA. We do</p> <p>21 not have an executed copy of the NDA, so I can't</p> <p>22 tell you what date it is.</p>

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<p style="text-align: right;">Page 129</p> <p>1 Q. Oh, I'm sorry. What year was</p> <p>2 Mr. Boschi communicating with Amazon about the</p> <p>3 NDA?</p> <p>4 A. I would have to -- it is either 2013</p> <p>5 or 2014. I'm not sure which year.</p> <p>6 Q. Okay. So that is the same time</p> <p>7 period that Mr. O'Connor was having those regular</p> <p>8 meetings with AWS, as far as you know?</p> <p>9 A. Yes.</p> <p>10 Q. All right. Speaking of NDAs, are</p> <p>11 you aware that VirtaMove executed several NDAs</p> <p>12 with Sun Microsystems?</p> <p>13 A. Yes.</p> <p>14 Q. And did you find copies of those</p> <p>15 NDAs in VirtaMove's files?</p> <p>16 A. Yes.</p> <p>17 Q. And, where in VirtaMove's files did</p> <p>18 you find those?</p> <p>19 A. In storage, hard paper copy files.</p> <p>20 Q. And did those files belong to a</p> <p>21 particular person or did you just have a general</p> <p>22 contracts file?</p>	<p style="text-align: right;">Page 131</p> <p>1 did?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. So, nobody who currently</p> <p>4 works at VirtaMove has any knowledge about what</p> <p>5 happened in 2003 or 2004; is that correct?</p> <p>6 A. No one at VirtaMove now is --</p> <p>7 correct. You are correct. Yes. I agree.</p> <p>8 Q. What, if anything, do you know about</p> <p>9 Donn Rochette?</p> <p>10 A. Donn Rochette was, I believe one of</p> <p>11 the founders of the company. He is also one of</p> <p>12 the patent inventors. Very technical.</p> <p>13 Q. Do you know where Donn Rochette is</p> <p>14 now?</p> <p>15 A. He lives in the United States. I</p> <p>16 think it is Iowa, if I'm not mistaken.</p> <p>17 Q. Does VirtaMove have a contact</p> <p>18 address for Mr. Rochette?</p> <p>19 A. I don't know. Not outside of where</p> <p>20 it would say on his LinkedIn where he is located.</p> <p>21 Q. You don't have any internal records</p> <p>22 that reflect where he is currently residing?</p>
<p style="text-align: right;">Page 130</p> <p>1 A. They were in a contracts file.</p> <p>2 Q. Do you know the circumstances</p> <p>3 surrounding those NDAs?</p> <p>4 A. For Sun Microsystems, no. Not</p> <p>5 really, no.</p> <p>6 Q. Do you know who at VirtaMove was</p> <p>7 responsible for VirtaMove's relationship with Sun</p> <p>8 Microsystems?</p> <p>9 A. That precedes my time. I don't know</p> <p>10 who would have been the key point of contact for</p> <p>11 that.</p> <p>12 Q. Is there anybody who still works at</p> <p>13 VirtaMove who also worked there in 2003 or 2004?</p> <p>14 A. No.</p> <p>15 Q. Who is the longest tenured person</p> <p>16 that still works at VirtaMove?</p> <p>17 A. Cedric Burgins.</p> <p>18 Q. And when did Mr. Burgins begin</p> <p>19 working at VirtaMove?</p> <p>20 A. I think it was October or November</p> <p>21 of 2011.</p> <p>22 Q. Okay. So, not too long before you</p>	<p style="text-align: right;">Page 132</p> <p>1 A. I don't know. I would have to look</p> <p>2 for that. No, I -- where he is currently</p> <p>3 residing, I don't think so. I'm not really sure.</p> <p>4 Q. Do you know if anyone at VirtaMove</p> <p>5 has had contact with Mr. Rochette since he left</p> <p>6 the company?</p> <p>7 MR. TONG: Objection. Potentially</p> <p>8 calls for privileged information. You can</p> <p>9 answer only for non-attorneys at VirtaMove.</p> <p>10 THE WITNESS: Only for non-attorneys</p> <p>11 at VirtaMove. I'm sorry, Peter. What do you</p> <p>12 mean?</p> <p>13 MR. TONG: Don't name any attorneys</p> <p>14 if they have had contact with Mr. Rochette.</p> <p>15 But you can otherwise answer for</p> <p>16 non-attorneys at VirtaMove and whether or not</p> <p>17 they have had contact with Mr. Rochette since</p> <p>18 he left the company.</p> <p>19 THE WITNESS: Thank you.</p> <p>20 I believe Nigel Stokes spoke with</p> <p>21 Donn Rochette.</p> <p>22 BY MR. ANAPOL:</p>

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<p style="text-align: right;">Page 133</p> <p>1 Q. When?</p> <p>2 A. Oh, boy. Earlier this year. I'm</p> <p>3 not sure exactly when, though.</p> <p>4 Q. And do you know if they spoke by</p> <p>5 e-mail or some other means?</p> <p>6 A. I think it was by phone or by Zoom.</p> <p>7 But I think it was by phone.</p> <p>8 Q. And do you know what they discussed?</p> <p>9 A. No, I wasn't part of the</p> <p>10 conversation. I don't know what they talked</p> <p>11 about. And I didn't set up that call.</p> <p>12 MR. ANAPOL: So, Peter, are you</p> <p>13 asserting that VirtaMove's lawyers have an</p> <p>14 attorney/client relationship with</p> <p>15 Mr. Rochette?</p> <p>16 MR. TONG: No. We do not have an</p> <p>17 attorney/client relationship with</p> <p>18 Mr. Rochette.</p> <p>19 MR. ANAPOL: So, why would the</p> <p>20 communications between VirtaMove's attorneys</p> <p>21 and Mr. Rochette be privileged?</p> <p>22 MR. TONG: I have not asserted</p>	<p style="text-align: right;">Page 135</p> <p>1 communication between Mr. Stokes and Mr. Rochette</p> <p>2 occurred earlier this year; is that right?</p> <p>3 A. I believe so. Yes.</p> <p>4 Q. Do you know how many times they</p> <p>5 spoke?</p> <p>6 A. I think it was only one time.</p> <p>7 Q. Do you know how long they spoke?</p> <p>8 A. Not a clue. No idea.</p> <p>9 Q. Do you know where Donn Rochette</p> <p>10 worked before VirtaMove?</p> <p>11 A. No.</p> <p>12 Q. Do you know where he works now?</p> <p>13 A. No.</p> <p>14 Q. All right. So, one of the topics</p> <p>15 you were designated to testify on today relates</p> <p>16 to agreements involving the patents in suit.</p> <p>17 Do you recall that?</p> <p>18 A. Yes.</p> <p>19 Q. And did you search for such</p> <p>20 agreements in preparing for your deposition</p> <p>21 today?</p> <p>22 A. What do you -- which types of</p>
<p style="text-align: right;">Page 134</p> <p>1 privilege over VirtaMove attorneys'</p> <p>2 communications with Mr. Rochette.</p> <p>3 I am asserting privilege over</p> <p>4 discussions between VirtaMove and its</p> <p>5 attorneys regarding Mr. Rochette.</p> <p>6 BY MR. ANAPOL:</p> <p>7 Q. Okay. So do you know, Ms. Cameron,</p> <p>8 do you know if anyone at VirtaMove, including</p> <p>9 VirtaMove's attorneys, has had contact with</p> <p>10 Mr. Rochette?</p> <p>11 MR. TONG: I caution the witness.</p> <p>12 Do not reveal any information communicated to</p> <p>13 you by attorneys.</p> <p>14 If you can answer the question</p> <p>15 without revealing attorney/client</p> <p>16 information, you may go ahead and answer.</p> <p>17 Otherwise, do not answer the</p> <p>18 question.</p> <p>19 THE WITNESS: The only thing I am</p> <p>20 aware of and I'm sure of is Nigel Stokes.</p> <p>21 BY MR. ANAPOL:</p> <p>22 Q. Okay. And you think that</p>	<p style="text-align: right;">Page 136</p> <p>1 agreements do you mean?</p> <p>2 Q. Agreements involving the patents in</p> <p>3 suit.</p> <p>4 A. I would have searched for</p> <p>5 agreements. But again, I find the question not</p> <p>6 very clear to me anyway.</p> <p>7 Q. You said you would have searched for</p> <p>8 agreements?</p> <p>9 A. Well, certainly. Obviously I have</p> <p>10 already stated I have looked for nondisclosure</p> <p>11 agreements. I looked for some agreements, some</p> <p>12 nondisclosure agreements. So, yes, I looked for</p> <p>13 agreements.</p> <p>14 Q. Okay. Aside from nondisclosure</p> <p>15 agreements, what agreements did you look for?</p> <p>16 A. Well, there would have been</p> <p>17 consulting agreements. What else? Partner</p> <p>18 agreements. Things of that nature.</p> <p>19 Q. And whatever agreements you found</p> <p>20 that related to the patents asserted in this</p> <p>21 case, you gave to your counsel; is that right?</p> <p>22 A. I gave counsel agreements, yes.</p>